

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Louis D. Minion

Title: Manager

REQUEST: AT&T Communications of New England, Set #7

DATED: May 18, 2001

ITEM: ATT 7-1 Regarding Verizon's claim of a 15% OSS maintenance factor, please provide adequate source documentation for the following figures:

- a) On Workpaper 4, OSS, Page 4, please provide the source of the figure titled, "PCT OF COSTS OCCURING IN MAINTENANCE PHASE"
- b) On Workpaper 4, OSS, Page 5, please provide the source of the figure titled, "PCT OF COSTS OCCURING IN MAINTENANCE PHASE"
- c) On Workpaper 4, OSS, Page 7, please provide the source of the figure titled, "PCT OF COSTS OCCURING IN MAINTENANCE PHASE"

REPLY:

- a) Please see page 8 of the Direct Testimony of Louis D. Minion.
- b) Please see page 9 of the Direct Testimony of Louis D. Minion.
- c) Please see page 9 of the Direct Testimony of Louis D. Minion.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Louis D. Minion

Title: Manager

REQUEST: AT&T Communications of New England, Set #7

DATED: May 18, 2001

ITEM: ATT 7-2 Regarding Verizon's claim for a 15% OSS maintenance factor, please provide a detailed description of the costs that are included in the numerator and in the denominator of each of the Low and High percentages shown in the following locations.

- (a) On Workpaper 4, OSS, Page 4, please provide the source of the figure titled, "PCT OF COSTS OCCURRING IN MAINTENANCE PHASE"
- (b) On Workpaper 4, OSS, Page 5, please provide the source of the figure titled, "PCT OF COSTS OCCURRING IN MAINTENANCE PHASE"
- (c) On Workpaper 4, OSS, Page 7, please provide the source of the figure titled, "PCT OF COSTS OCCURRING IN MAINTENANCE PHASE"

REPLY: The percentages themselves are directly quoted from the industry sources identified, and are not derived here. Detailed information as to the numerator and denominator are not available. Attached are the source documents themselves.